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February 23, 2010

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**Via ECFS Transmission**

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, D.C. 20554

**Re: EB Docket No. 06-36  
Vimadi 2110 LLC  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2009**

Dear Ms. Dortch:

Vimadi 2110 LLC, by its attorneys and pursuant to section 64.2009(e) of the Commission's rules, hereby submits its 2009 Customer Proprietary Network Information (CPNI) certification with accompanying statement.

Please contact me if you have any questions.

Respectfully submitted,

HOGAN & HARTSON, L.L.P.



Grace Kavadoy

cc: FCC Enforcement Bureau, Telecommunications Consumers Division  
Best Copy and Printing, Inc.

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date filed: February 19, 2010

Name of company(s) covered by this certification: Vimadi 2110 LLC.

Form 499 Filer ID: 826947

Name of signatory: Carolina Lanao

Title of signatory: Vice President

I, Carolina Lanao, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
Carolina Lanao

**Attachments:** Accompanying Statement explaining CPNI procedures

## **Vimadi 2110 LLC**

### **Statement on CPNI Compliance**

1. Vimadi does not use CPNI to market any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes. Vimadi prohibits the use, disclosure, or access to CPNI for any purpose other than providing or marketing services or products to a customer that are among the categories of service to which the customer already subscribes. Such use, disclosure, or access does not require customer approval, as specified in 47 CFR section 64.2005. Vimadi does not permit any access to or use of CPNI by any agent, affiliate or third party.
2. Vimadi's policy recognizes and would require compliance with the requirements for approval by the customer for the use of CPNI information as specified in 47 CFR section 64.2007, if Vimadi marketed any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes, or if Vimadi permitted any access to or use of CPNI by any agent, affiliate or third party.  
However, Vimadi does not market any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes, and Vimadi does not permit any access to or use of CPNI by any agent, affiliate or third party.
3. Vimadi's policy recognizes and would require compliance with the notice to customers required for use of CPNI as specified in 47 CFR section 64.2008, if Vimadi marketed any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes, or if Vimadi permitted any access to or use of CPNI by any agent, affiliate or third party.  
However, Vimadi does not market any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes, and Vimadi does not permit any access to or use of CPNI by any agent, affiliate or third party.
4. Vimadi's policy recognizes and would require compliance with the safeguards required for use of CPNI as specified in 47 CFR section 64.2009, including, but not limited to the requirement to maintain records of marketing campaigns that use customers' CPNI. To date, Vimadi has not conducted any such campaigns. Vimadi does not market any service or product to a customer other than service offerings among the categories of service to which the customer already subscribes, and Vimadi does not permit any access to or use of CPNI by any agent, affiliate or third party. Vimadi trains its employees as to compliance with the CPNI rules and under its policy would discipline an employee for failure to follow the policy or the rules.

5. Vimadi does not permit disclosure to a customer of call detail information over the telephone without a password and otherwise follows the requirements of 47 section 64.2010(b). For on-line access to CPNI, Vimadi requires authentication of a customer without the use of readily available biographical or account information, and once authenticated, a customer may obtain CPNI only with a password, as required by 47 CFR section 2010(c). Vimadi does not provide any in-store access to CPNI. Vimadi notifies customers immediately as to confirm changes in such account information as a new password or new credit card information.

Vimadi uses best practices (including encryption) to prevent unauthorized access to its database containing CPNI.

Vimadi's policy requires notification of CPNI security breaches to law enforcement and customers as required by 47 CFR section 64.2011.